



Council of the European Union
General Secretariat

Brussels, 21 November 2017

WK 13553/2017 INIT

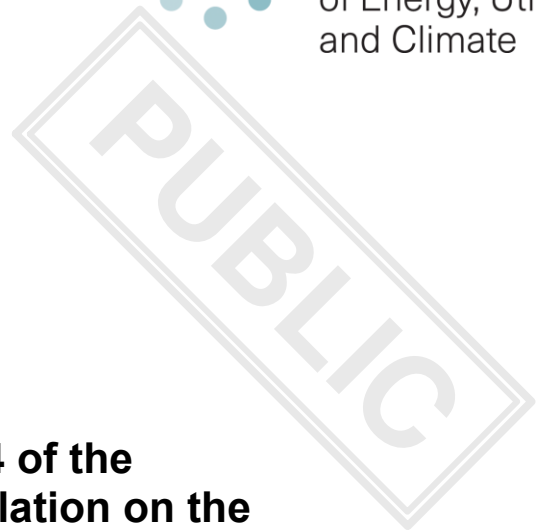
LIMITE

**ENER
CLIMA**

CONTRIBUTION

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| From: | General Secretariat of the Council |
| To: | Delegations |
| Subject: | DK comments on the revised Governance Regulation |

Delegations will find in annex the DK comments on the revised Governance Regulation.



DK written comments on revision 4 of the Commission's proposal for a Regulation on the governance of the energy union

PLEASE NOTE THAT DENMARK HOLDS A GENERAL RESERVATION
AND A SCRUTINY RESERVATION ON THE ENTIRE PROPOSAL AND
THESE COMMENTS ARE WITHOUT PREJUDICE TO ANY SUBSEQUENT
POSITIONS TAKEN

*Changes to the revision are **bold, and underlined**. Deletions are marked
with ~~strikethrough~~.*

Specific Comments

(34bis)

Text proposal

~~Cost effective deployment of renewable energy is an essential and primary
parameter for assessing objective criteria.~~ The cost structure of deploying
renewable energy is complex and varies significantly between Member
States. It includes not only simply the costs of support schemes, but, inter
alia, the connection costs of installations, system backup, providing system
security and costs that need to be borne when complying with
environmental restrictions. Thus when comparing Member States based on
this criterion, all costs related to deployment, whether they are borne by the
Member State, final consumers or project developers, should be accounted
for.

Justification

The preamble should not assign special weight to any of the objective
criteria set forth in Article 5. As point of departure, we consider these to
have equal weight.

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Artikel 5

Text proposal

- (a) **any relevant** circumstances affecting renewable energy deployment, such as *inter alia*:
- (...)
- (iv) the level of power interconnection between Member States up to level that the European Council in 2014 set as the objective for 2030, which is a 15 pct. increase compared to the 2014 level.

Justification

The governance system should not give a disincentive to invest in interconnections.

Artikel 5

Text proposal

- (b) **any relevant** circumstances affecting renewable energy deployment, such as *inter alia*:
- (...)
- (v) early efforts as defined in Article 2(19).
- (VI) **The share of renewable energy in the energy sector**

Justification

When member state already has a high share of renewable in the energy sector it will be much more challenging to increase the overall share of renewable energy. This should be taken into consideration when evaluating the contribution.

Article 27(2bis)



Text proposal

In issuing the recommendations in the area of renewable energy, the Commission shall take into consideration ambitious early efforts by Member States to contribute to the Union's 2030 target for renewable energy. The Commission shall also take into consideration renewable energy projects for which a final investment decision has been taken, will become operational in the period 2021-2030 and have a significant impact on a Member State's national contribution, **as well as substantial policy and market developments that will ensure the expansion of national renewable energy deployment.**

Justification

If the member state has regulation in place which ensures that the country's contribution to the 2030 target for renewable energy will be implemented before 2030 this should be taken into consideration by the Commission when issuing recommendations. The Commission should also take into consideration if the member state can substantiate that the market will ensure the expansion outlined in the national energy and climate plan.